BURSOR FISHER

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August 30, 2019

Via Certified Mail - Return Receipt Requested

Widow Jane Distilleries LLC 160 Coffey Street Brooklyn, NY 11231

Re: Violation of U.C.C. §§ 2-313, 2-314; all other applicable laws

To Whom It May Concern:

This letter serves as a preliminary notice and demand for corrective action by Widow Jane Distilleries LLC ("You" or "Defendant") pursuant to numerous provisions New York law, including but not limited to N.Y.G.B.L. §§ 349 and 350, on behalf of our client, Marc Boshnack. This letter also serves as notice pursuant to U.C.C. § 2-607(3)(A) concerning the breaches of express warranties described herein.

You have participated in the marketing and sale of Widow Jane Bourbon (the "Product"). The label for Widow Jane Bourbon represented that the Product contained "Pure Limestone Mineral Water from the Widow Jane Mine – Rosendale, NY." You have also represented that the Product is "hand assembled in Brooklyn." Both of these representations are false and misleading. The Century House Historical Society ("CHHS"), the owners and custodians of the Widow Jane Mine, have expressly disclaimed supplying You with water for Widow Jane Bourbon. Moreover, Widow Jane Bourbon is not "hand assembled in Brooklyn." It is purchased from a distillery in Kentucky.

Mr. Boshnack purchased the Product based on Your misleading representations.

Mr. Boshnack is acting on behalf of a class defined as all persons in the United States who purchased the Product. Mr. Boshnack is also acting on behalf of a subclass of persons who purchased the Product in the State of New York.

To cure these defects, we demand that you make full restitution to all purchasers of the Product of all money obtained from sales thereof.

We further demand that you preserve all documents and other evidence which refer or relate to any of the above-described practices including, but not limited to, the following:

1. All documents concerning the design, development, and/or testing of the Product;

- 2. All documents concerning the advertisement, labeling, marketing, or sale
- 3. All documents concerning communications with purchasers of the Product, including but not limited to customer complaints; and

of the Product;

4. All documents concerning your total revenue derived from sales of the Product in New York and the United States.

If you contend that any statement in this letter is inaccurate in any respect, please provide us with your contentions and supporting documents immediately upon receipt of this letter.

Please contact me right away if you wish to discuss an appropriate way to remedy this matter. If I do not hear from you by September 20, 2019, I will take that as an indication that you are not interested in doing so, and I will file the Complaint attached hereto as Exhibit A.

Very truly yours,

Yitzchak Kopel

U. Kopel

Encl.